

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



FILED

12-11-07
04:59 PM

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Low Income Energy Efficiency Programs of California's Energy Utilities

Rulemaking 07-01-042
(January 25, 2007)

Southern California Edison Company's (U 338-E) Application for Approval of SCE's "Change A Light, Change The World," Compact Fluorescent Lamp Program.

Application 07-05-010
(May 10, 2007)

**COMMENTS OF DISABILITY RIGHTS ADVOCATES ON THE PROPOSED
DECISION REGARDING THE LIEE PROGRAM**

DISABILITY RIGHTS ADVOCATES
MELISSA W. KASNITZ
MARY-LEE E. KIMBER
2001 Center Street, Third Floor
Berkeley, California 94704-1204
Telephone: 510-665-8644
Fax: 510-665-8511
TTY: 510-665-8716
pucservice@dralegal.org

December 10, 2007

I. INTRODUCTION

On November 19, 2007, Commissioner Grueneich and Administrative Law Judge Malcolm issued the “Proposed Decision Providing Direction for Low Income Energy Efficiency Policy Objectives, Program Goals, Strategic Planning and the 2009-2011 Program Portfolio and Addressing Renter Access and Assembly Bill 2140 Implementation” (“PD”). Disability Rights Advocates (DisabRA) submit the following comments in response to this PD.

DisabRA became involved in this proceeding to represent the specific and unique needs of persons with disabilities. Persons with disabilities are disproportionately low income and accordingly rely on programs such as LIEE. Indeed the Final Report on Phase 2 Low Income Needs Assessment (KEMA Report) found that one in four low income households have a member with a disability, and that for 20% of all low income households, the responsibility for making energy payments on behalf of the household lies with a disabled household member.¹ Persons with disabilities are also highly dependent on energy and thus, on programs providing affordable access to energy. The KEMA Report found that 56% of low income households with a disabled member spend more than 5% of their total household income on energy.² This dependence on energy stems from several facts including the fact that many persons with disabilities spend more time at home than their non-disabled counterparts,³ that electricity powers much of the assistive technology which allows persons with disabilities to live independently in the

¹ “Final Report on Phase 2 Low Income Needs Assessment,” issued by the California Public Utilities Commission, September 7, 2007, p. 4-7 and 4-22.

² KEMA Report, p. 5-15. DisabRA recognizes that the Medical Baseline program is designed to address additional energy needs resulting from a person’s disability. The Medical Baseline program is open to all with disabilities, not just low income customers. Even though Medical Baseline may reduce costs resulting from a greater energy burden, persons with disabilities who are low income, like all low income customers, continue to face substantial burdens in paying their energy bills.

³ National Organization on Disability-Harris Poll in 2000 found that people with disabilities are less likely to socialize and participate in leisure activities outside the home.

community and that some disabilities cause an individual to be particularly sensitive to extreme temperatures.

Given the needs of the disabled population, DisabRA appreciates the PD's continued support of the "quality of life" goals of the LIEE program. However, DisabRA respectfully requests that the final decision incorporate DisabRA's comments on the KEMA Report within the discussions of auto-enrollment, partnerships with other entities and targeted outreach so that the needs of persons with disabilities will be addressed in the final decision.

II. DISABILITY RIGHTS ADVOCATES APPRECIATES THE PROPOSED DECISION'S CONTINUED SUPPORT OF QUALITY OF LIFE GOALS OF THE LIEE PROGRAM.

While the PD decision "sets a new course for the LIEE programs in California,"⁴ it explicitly notes that, in addition to the LIEE programs being an energy resource, such programs are intended to among other things "improve [low income customers'] quality of life."⁵ As DisabRA pointed out in its comments on the objectives and goals of the LIEE program, "[n]on-energy benefits, such as health, safety and comfort, are of particular concern for persons with disabilities."⁶ While 26% of low income households reported a health problem due to a condition of their home, such as poor air quality or house temperature, 42% of low income households with a disabled household member report such a health-related concern.⁷ This is unsurprising given that some physical disabilities affect a person's respiratory function or ability to regulate body temperature. In addition, the KEMA report found that 86% of low income households have at least one comfort concern, such as the house being too cold or too hot. These comfort concerns are common for temperature-sensitive persons with disabilities.

⁴ PD, p. 3.

⁵ *Id.*

⁶ Disability Rights Advocates' Comments on LIEE Program Objectives and Goals (April 27, 2007), p. 4.

⁷ KEMA Report, p. 5-29

The PD also adopts the following policy: “LIEE programs should include measures that may not be cost-effective but that may promote the quality of life of participating customers.”⁸ DisabRA supports this policy. As DisabRA explained in its comments on the objectives and goals of the LIEE program, LIEE measures may not be cost-effective as their installation may not result in a decrease in energy consumption for some low income customers. This is because some low income households currently may eliminate some forms of energy usage altogether because of their inability to pay costly energy bills. Accordingly, increased energy efficiency through the installation of energy efficient measures may allow these low income customers to restore such usage and actually increase energy use.⁹ DisabRA believes that the PD, in noting that improving quality of life may not always be cost-effective, appropriately accounts for this possibility.

III. DISABILITY RIGHTS ADVOCATES RESPECTFULLY REQUESTS THAT THE FINAL DECISION INCORPORATE ITS COMMENTS ADDRESSING THE KEMA REPORT.

In discussing implementation strategies for the LIEE program, the PD discusses the parties’ comments on the KEMA report. As the PD notes, parties were asked to comment on the KEMA Report’s recommendations and provide specific implementation ideas. DisabRA submitted comments to this effect and respectfully request that the relevant portions of those comments be incorporated into the final decision.

A. DisabRA Supports Investigating Auto-Enrollment in the LIEE Program If a Household Receives Disability Benefits.

The PD notes that SCE is in favor of investigating auto-enrollment in the LIEE Program if a household receives social security or disability benefits.¹⁰ DisabRA also provided comments on this issue.

⁸ PD, p. 3; *see also* Finding of Fact No. 10, p. 84.

⁹ Disability Rights Advocates’ Comments on LIEE Program Objectives and Goals, p. 6.

¹⁰ PD, p. 41.

In its comments on the KEMA report, DisabRA advocated “that the Commission investigate whether persons on SSDI who are the party responsible for paying the bill should automatically qualify for LIEE measures.”¹¹ DisabRA also noted that SSDI qualification is not based on household income. However, if the person on SSDI is the party responsible for paying the bill, as is the case in 20% of all low income households, it is likely that the SSDI payment is the primary, if not sole, income for the household, putting the household in the income range to qualify for LIEE.¹² DisabRA respectfully requests that its comments on the KEMA report be included as a part of the discussion on auto-enrollment.¹³

B. DisabRA Supports Using CBOs as a Part of Efforts to Increase Participation in the LIEE Program.

The PD notes that various parties in this proceeding are in favor of using CBOs as partners in efforts to increase participation in the LIEE program.¹⁴ DisabRA urged the same approach in its comments on the KEMA Report.

In those comments, DisabRA explained that the KEMA Report found that households with persons who have disabilities are one of the “most promising” segments of the low income population for the LIEE program, meaning they exhibit need, willingness and can be easily accessed through existing outreach, including community-based strategies.¹⁵ As such, DisabRA recommended that there be an aggressive outreach campaign to disability-related community-based organizations. DisabRA explained that

¹¹ Comments of Disability Rights Advocates on the Issues Raised in the KEMA Report (October 16, 2007), p. 4.

¹² *Id.*

¹³ DisabRA does not ask for a separate finding of fact, conclusion of law or ordering paragraph on this issue as the issue is addressed only in the body of the decision.

¹⁴ PD, p. 41-42.

¹⁵ KEMA Report, p. 7-13.

disability-related community-based organizations that specialize in providing information on assistance programs and advocacy for persons with disabilities, such as independent living centers, have a high percentage of clients who are low income and that these organizations function as a clearinghouse for information on enrollment in other public programs, such as SSDI, and could add energy savings programs to the information which they provide. DisabRA respectfully requests that its comments on the KEMA report be included as a part of the discussion on partnerships with other entities.¹⁶

C. **DisabRA Urges that All Outreach Efforts Be Accessible to Persons with Disabilities.**

In its comments on the KEMA Report, DisabRA expressed concern that outreach for the LIEE program be accessible to persons with disabilities, particularly since the disabled population remains one of the most underserved populations by the LIEE program. DisabRA highlighted the key aspects of accessible outreach, much of which has been adopted by the Commission in other proceedings.¹⁷ First, accessible outreach requires that the utilities maintain effective TTY service to ensure TTY calls are answered in the same manner and with the same efficiency as other voice calls.¹⁸ Further, TTY numbers should be presented with the same prominence as other contact numbers.¹⁹ Second, accessible outreach also requires that written outreach materials for

¹⁶ Again DisabRA does not ask for a separate finding of fact, conclusion of law or ordering paragraph on this issue as the issue is addressed only in the body of the decision.

¹⁷ See generally D. 07-11-045 (November 16, 2007), App. A, p. 6 – 8. D.07-11-045 makes clear that qualification for the LIEE program is a threshold for participation in the low income incentive program within the California Solar Initiative (CSI). *Id.* at 15. As such, if the LIEE program is not accessible to persons with disabilities, the CSI program, despite the Commission's endorsement of accessible communications, will effectively also be inaccessible to persons with disabilities. In order to be both consistent with other Commission decisions and to ensure that persons with disabilities can take advantage of the LIEE program, DisabRA has encouraged and continues to encourage the Commission to require that the LIEE program be made accessible to persons with disabilities.

¹⁸ As adopted in D.06-12-038 (Dec. 14, 2006), p. 15.

¹⁹ *Id.*

the LIEE program be made available in large print.²⁰ Additionally, the utilities should be directed to note in large print on the standard version of the outreach material that there is further information about the LIEE program available in large print upon request.

The PD does not discuss accessible outreach. DisabRA urges the Commission to ensure that its final decision addresses this important issue for persons with disabilities. DisabRA asks that the final decision incorporate its comments on accessible outreach. Further, DisabRA requests that the Commission include a finding of fact regarding accessible outreach per the proposed language in Appendix A

D. DisabRA Advocates the Use of CBOs and Accessible Formats in All Marketing, Education and Outreach for the LIEE Program.

The PD emphasizes the importance of marketing, education and outreach (ME&O). Again, DisabRA stresses the need to utilize disability-related CBOs in all efforts to target the disabled population. Further, as described above, DisabRA urges the Commission to require the utilities to ensure all ME&O is accessible to persons with disabilities. To this end, DisabRA urges the inclusion of the finding of fact regarding accessible outreach as noted in Appendix A.

IV. CONCLUSION

DisabRA appreciates the opportunity to describe the needs of its constituency with regards to the LIEE program. DisabRA believes that the PD appropriately continues to support the quality of life LIEE goals. DisabRA requests, however, that its comments on the KEMA Report be incorporated into the final decision. These comments recommend further investigation into auto-enrollment in the LIEE program if a household receives disability benefits, use of disability-related CBOs in efforts to expand participation in LIEE and provision of accessible outreach for the LIEE program. DisabRA respectfully requests that the Commission adopt DisabRA's recommendations as a part of the Commission's final decision.

²⁰ Large print is the most common accessible format for written materials; however, the utilities should be prepared to make available other alternate formats, such as Braille, for any written materials relating to the

Signed: December 10, 2007

Respectfully Submitted,

/s/

MARY-LEE E. KIMBER
MELISSA W. KASNITZ
Disability Rights Advocates
2001 Center Street, Third Floor
Berkeley, CA 94704

\\Server\cases\PUC_Projects\LIEE\Pleadings\LIEE_PD_Comments.doc

LIEE program.

CERTIFICATE OF SERVICE

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of “Comments of Disability Rights Advocates on the Proposed Decision Regarding the LIEE Program,” with Appendix A, on all known parties on R.07-01-042, A.07-05-010.

Dated December 11, 2007, at Berkeley, California.

/s/

Lauren M. Roberts

Parties

BOBBI J. STERRETT
SNR. SPECIALIST/STATE REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002

FRANCISCO V. AGUILAR
ATTORNEY AT LAW
SOUTHWEST GAS CORPORATION
PO BOX 98510
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89193

VALERIE J. ONTIVEROZ
SPECIALIST/ STATE REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89193-8510

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89520

MICHAEL R. THORP
ATTORNEY
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, 14TH FLOOR
LOS ANGELES, CA 90013-1011

ALEX SOTOMAYOR
MARAVILLE FOUNDATION
5729 UNION PACIFIC AVENUE
LOS ANGELES, CA 90022

RICHARD VILLASENOR
TELACU
12252 MC CANN DRIVE
SANTA FE SPRINGS, CA 90670

MICHAEL MONTOYA
SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

STACIE SCHAFFER
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 390
ROSEMEAD, CA 91770

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773

DON WOOD SR.
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941

GEORGETTA J. BAKER
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC/SOCAL GAS
101 ASH STREET, HQ 13
SAN DIEGO, CA 92101

KIM F. HASSAN
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP 32 D
SAN DIEGO, CA 92123

TIMOTHY J. LAWLER
SUNDOWNER INSULATION CO., INC.
1495 ROAD AVENUE
CLOVIS, CA 93612

PAUL KERKORIAN
UTILITY COST MANAGEMENT, LLC
6475 N PALM AVE., STE. 105
FRESNO, CA 93704

JERRY H. HANN
PERKINS, MANN & EVERETT, A.P.C.
2222 W. SHAW AVENUE, SUITE 202
FRESNO, CA 93711

JERRY H. MANN
ATTORNEY AT LAW
PERKINS, MANN & EVERETT
2222 W. SHAW AVE., SUITE 202
FRESNO, CA 93711

GREGORY REDICAN
DEPUTY DIRECTOR
COMMUNITY ACTION AGENCY OF SAN MATEO
930 BRITTAN AVENUE
SAN CARLOS, CA 94070

HAYLEY GOODSON
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

RASHID A. RASHID
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CRAIG M. BUCHSBAUM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

LUKE TOUGAS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

EDWARD G. POOLE
ATTORNEY AT LAW
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108-2818

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

IRENE K. MOOSEN
ATTORNEY AT LAW
WESTERN MANUFACTURED HOUSING COMM. SVCS.
53 SANTA YNEZ AVENUE
SAN FRANCISCO, CA 94112

CHONDA J. NWAMU
PACIFIC GAS AND ELECTRIC COMPANY
POST OFFICE BOX 7442
SAN FRANCISCO, CA 94120

PETER OUBORG
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, B30A
SAN FRANCISCO, CA 94120-7442

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

JOHN DUTCHER
VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

THALIA N.C. GONZALEZ
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLR.
BERKELEY, CA 94704

MARY - LEE KIMBER
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, 3RD FLOOR
BERKELEY, CA 94704-1204

MELISSA W. KASNITZ
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

SUSAN E. BROWN
A WORLD INSTITUTE FOR SUSTAINABLE HUMANI
PO BOX 428
MILL VALLEY, CA 94942

MICHAEL LAMOND
ALPINE NATURAL GAS OPERATING COMPANY
PO BOX 550
15 ST. ANDREWS ROAD, SUITE 7
VALLEY SPRINGS, CA 95252

BILL JULIAN
43556 ALMOND LANE
DAVIS, CA 95618

CAROLYN COX
GENERAL MANAGER
5213 ROSEANA COURT
FAIR OAKS, CA 95628

WILLIAM W. WESTERFIELD, 111
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS L.L.P.
2015 H STREET
SACRAMENTO, CA 95814

JAMES HODGES
ACCES
1069 45TH STREET
SACRAMENTO, CA 95819

RAYMOND J. CZAHAR, C.P.A.
CHIEF FINANCIAL OFFICER
WEST COAST GAS COMPANY
9203 BEATTY DRIVE
SACRAMENTO, CA 95826

CRISTAL BEDORTHA
RESIDENTIAL WALL INSULATION
3714 NELSON AVE.
OROVILLE, CA 95965

MICHELLE MISHOE
PACIFICORP
825 NE MULTNOMAH STREET
PORTLAND, OR 97232

RYAN FLYNN
PACIFICORP
825 NE MULTNOMAH STREET, 18TH FLOOR
PORTLAND, OR 97232

Information Only

RICHARD ESTEVES
SESCO, INC.
77 YACHT CLUB DRIVE, SUITE 1000
LAKE HOPATCONG, NJ 07849-1313

JIM MEYERS
SOUTHWEST REGIONAL MANAGER
NORTH AMERICAN INSULATION MANUF. ASSOC.
7792 SOUTH HARRISON CIRCLE
CENTENNIAL, CO 80122

DON STONEBERGER
APS ENERGY SERVICES
SUITE 750
400 E. VAN BUREN STREET
PHOENIX, AZ 85004

TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
6100 NEIL ROAD, MS S4A50
RENO, NV 89520

STEVEN D. PATRICK
ATTORNEY AT LAW
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET GT14E7
LOS ANGELES, CA 90013-1011

SENATOR RICHARD POLANCO
3701 GLENALBYN DRIVE
LOS ANGELES, CA 90065

GREGORY J. KOSIER
PORTFOLIO MANAGER
CONSTELLATION NEWENRGY, INC.
350 SOUTH GRND AVENUE, 38TH FLOOR
LOS ANGELES, CA 90071

MICHAEL MAZUR
CHIEF TECHNICAL OFFICER
3 PHASES RENEWABLES, LLC
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266

RON GARCIA
RELIABLE ENERGY MANAGEMENT, INC.

LUIS CHAVEZ
1859 BUSINESS CENTER DRIVE

6250 PARAMOUNT BLVD.
LONG BEACH, CA 90805

DUARTE, CA 91010

MONTE WINEGAR
PROJECT DIRECTOR
WINEGARD ENERGY
1818 FLOWER AVENUE
DUARTE, CA 91010

KYLE MAETANI
MK PLANNING CONSULTANTS
2740 W. MAGNOLIA BLVD., STE 103
BURBANK, CA 91505

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737

ALLAN RAGO
QUALITY CONSERVATION SERVICES, INC.
SUITE E
4701 ARROW HIGHWAY
MONTCLAIR, CA 91763

AKBAR JAZAYEIRI
SOUTHERN CALIFORNIA EDISON COMPANY
2241 WALNUT GROVE AVENUE
PO BOX 800
ROSEMEAD, CA 91770

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
LAW DEPARTMENT
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JACK F. PARKHILL
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JEANNIE HARRELL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JOHN FASANA
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GOVE AVE.
ROSEMEAD, CA 91770

JOHN FASANA
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JOHN NALL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVE
ROSEMEAD, CA 91770

LARRY R. COPE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON
PO BOX 800 2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

PETE ZANZOT
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

ROBERTO DEL REAL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

MARK MCNULTY
5150 RANDLETT DRIVE
LA MESA, CA 91941

GREG BASS
SEMPRA ENERGY SOLUTIONS
101 ASH STREET. HQ09
SAN DIEGO, CA 92101-3017

MICHAEL SHAMES
ATTORNEY AT LAW

JOHN JENSEN
REGIONAL MANAGER

UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

RICHARD HEATH AND ASSOCIATES, INC.
7847 CONVOY COURT , SUITE 102
SAN DIEGO, CA 92111

YOLE WHITING
SAN DIEGO GAS & ELECTRIC COMPANY
8335 CENTURY PARK COURT
SAN DIEGO, CA 92123

CENTRAL FILES
REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT-CP31E
SAN DIEGO, CA 92123-1530

STEVE RAHON
DIRECTOR, TARIFF & REGULATORY ACCOUNTS
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO, CA 92123-1548

BILL BELANSKY
WESTERN INSULATION
16465 VIA ESPRILLO
SAN DIEGO, CA 92127

TOM HAMILTON
ENERGY PROGRAM MANAGER
QUALITY BUILT
15330 AVENUE OF SCIENCE
SAN DIEGO, CA 92128

FRED PATZKE
13576 CALIFORNIA STREET
YUCAIPA, CA 92399-5449

JOHN NEWCOMB
696 SOUTH TIPPECANOE AVENUE
SAN BERNARDINO, CA 92415

MARIA Y. JUAREZ
DEPUTY DIRECTOR
DEPARTMENT OF COUMMINTY ACTION
RIVERSIDE COUNTY
2038 IOWA AVENUE, SUITE B-102
RIVERSIDE, CA 92507

DAVID J. COYLE
ANZA ELECTRIC COOPERATIVE, INC
58470 HIGHWAY 371
ANZA, CA 92539-1909

ROB GUNNIN
VICE PRESIDENT SUPPLY
COMMERCE ENERGY, INC.
600 ANTON BLVD., SUITE 2000
COSTA MESA, CA 92626

RICHARD SHAW
PRESIDENT
SOUTHERN CALIFORNIA FORUM
PO BOX 469
FILLMORE, CA 93016

JIM MCNAMARA
SAN LUIS OBISPO COUNTY, INC.
1030 SOUTHWOOD DRIVE
SAN LUIS OBISPO, CA 93401

ART BRICE
VICE PRESIDENT
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE., STE. 103
FRESNO, CA 93650

JOE WILLIAMS
CEO
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVENUE, STE 103
FRESNO, CA 93650

KRISTINE LUCERO
EXECUTIVE ASSISTANT
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE., STE. 103
FRESNO, CA 93650

MARK SHIRIN
VENTURA TV APPLIANCE CENTER
3619 E VENTURA BLVD
FRESNO, CA 93702-5009

BEN CARROLL
2615 W DUDLEY AVE.

JOSEPH AMADER
7620 CARMEL VALLEY RD.

FRESNO, CA 93728

CARMEL, CA 93923

ORTENSIA LOPEZ
EXECUTIVE DIRECTOR
EL CONCILIO OF SAN MATEO
1419 BURLINGAME AVE., SUITE N
BURLINGAME, CA 94010

WILLIAM F. PARKER
EXECUTIVE DIRECTOR
COMMUNITY ACTION AGENCY OF SAN MATEO
930 BRITTAN AVENUE
SAN CARLOS, CA 94070

BRUCE FOSTER
VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, STE. 2040
SAN FRANCISCO, CA 94102

REGINA COSTA
RESEARCH DIRECTOR
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

DONNA L. WAGONER
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BRETT SEARLE
PROJECT MANAGEMENT ANALYST
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION-ROOM 1464, MCH14F
SAN FRANCISCO, CA 94105

DANIEL COOLEY
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B30A
SAN FRANCISCO, CA 94105

LINDA FONTES
PACIFIC GAS & ELECTRIC COMPANY
123 MISSION ROOM 1404 MC H14F
SAN FRANCISCO, CA 94105

STEVEN R. HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

TINA NGUYEN
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION-ROOM 1456
SAN FRANCISCO, CA 94105

BRIAN K. CHERRY
DIRECTOR REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B10C
SAN FRANCISCO, CA 94106

JANINE L. SCANCARELLI
ATTORNEY AT LAW
FOLGER, LEVIN & KAHN, LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

MARY O'DRAIN
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION - ROOM 1410, MC H14G
SAN FRANCISCO, CA 94177

ROLAND RISSE
DIRECTOR, CUSTOMER ENERGY EFFICIENCY
PACIFIC GAS & ELECTRIC COMPANY
MAIL CODE N6G
PO BOX 770000
SAN FRANCISCO, CA 94177

JAMES DEZELL
RHA, INC.

KEVIN CUDD
SENIOR PROGRAM MANAGER

SUITE 205
1151 HARBOR BAY PKWY
ALAMEDA, CA 94502

PG&E
1320 EL CAPITAN DRIVE, SUITE 330
DANVILLE, CA 94526

DUTCHER JOHN
V.P. REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534

DAVID C. CLARK
SYNERGY COMPANIES
28436 SATELLITE STREET
HAYWARD, CA 94545

STEVEN R. SHALLENBERGER
SYNERGY COMPANIES
28436 SATELLITE STREET
HAYWARD, CA 94545

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2678 BISHOP DRIVE
SAN RAMON, CA 94583

LADONNA WILLIAMS
EXECUTIVE DIRECTOR
PO BOX 5653
VALLEJO, CA 94591

JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609

BOBAK ROSHAN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY STREET, 2ND FLOOR
BERKELEY, CA 94704

CISCO DEVRIES
CHIEF OF STAFF
CITY OF BERKELEY
OFFICE OF MAYOR TOM BATES
2180 MILVIA STREET
BERKELEY, CA 94704

JESSE W. RASKIN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704

MARK A. RUTLEDGE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLR.
BERKELEY, CA 94704

STEPHANIE CHEN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY STREET, 2ND FLOOR
BERKELEY, CA 94704

KAREN NOTSUND
ASSISTANT DIRECTOR
UC ENERGY INSTITUTE
2547 CHANNING WAY 5180
BERKELEY, CA 94720-5180

PETER HOFMANN
BO ENTERPRISES
43B EAST MAIN ST
LOS GATOS, CA 95030-6907

DOUGLAS MOIR
WESTERN APPLIANCE
1976 W. SAN CARLOS STREET
SAN JOSE, CA 95128

FRANCES L. THOMPSON
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION STREET, RM. 1408 MC H14G
SAN FRANCISCO, CA 95177

ELISE KLEIBER
2400 ROCKEFELLER DR.
CERES, CA 95307

THOMAS S KIMBALL
MODESTO IRRIGATION DISTRICT

BOB HONDEVILLE
MODESTO IRRIGATION DISTRICT

1231 11TH STREET
MODESTO, CA 95352-4060

1231 11TH STREET
MODESTO, CA 95354

JOY WARREN
SENIOR STAFF ATTORNEY
MODESTO IRRIGATION DISTRICT
1231 ELEVENTH STREET
MODESTO, CA 95354

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616

DAVID MORSE
CALIFORNIA WATER SERVICE COMPANY
1411 W. COVELL BLVD., STE. 106-292
DAVIS, CA 95616-5934

JOHN JENSEN
PRESIDENT
MOUNTAIN UTILITIES
PO BOX 205
KIRKWOOD, CA 95646

JASON WIMBLEY
DIVISION CHIEF, ENERGY&ENVIRON PROGRAMS
DEPT. OF COMMUNITY SERVICES & DEVELOPMEN
700 NORTH 10TH STREET, ROOM 258
SACRAMENTO, CA 95814

ROBERT J. BICKER
LEGISLATIVE ANALYST
CALIFORNIA APARTMENT ASSOCIATION
980 NINTH STREET, SUITE 200
SACRAMENTO, CA 95814

RYAN BERNARDO
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

SHEILA DEY
WESTERN MANUFACTURED HOUSING COMMUNITIES
455 CAPITOL MALL STE 800
SACRAMENTO, CA 95814

DAVE STEPHENSON
RATE REGULATION MANAGER - WESTERN REGIO
AMERICAN WATER WORKS SERVICE CO.
4701 BELOIT DRIVE
SACRAMENTO, CA 95838

JAMES O'BANNON
RICHARD HEATH AND ASSOCIATES, INC.
1026 MANGROVE AVE., STE 20
CHICO, CA 95926

PAMELA GORSUCH
PROJECT MANAGER
RICHARD HEATH AND ASSOCIATES, INC.
1026 MANGROVE AVENUE, SUITE 20
CHICO, CA 95926

SCOTT BERG
SELF HELP HOME IMPROVEMENT PROJECT INC.
3777 MEADOWVIEW DR., 100
REDDING, CA 96002

ROBERT MARSHALL
PLUMAS SIERRA RURAL ELECTRIC
PO BOX 2000
PORTOLA, CA 96122-2000

M. SAMI KHAWAJA, PH.D
QUANTEC, LLC
SUITE 400
720 SW WASHINGTON STREET
PORTLAND, OR 97205

CATHIE ALLEN
CA STATE MGR.
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 2000
PORTLAND, OR 97232

MARISA DECRISTOFORO
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 800
PORTLAND, OR 97232

DAVE SULLIVAN P.E.
CONSULTING ENGINEER

614 38TH PLACE
FLORENCE, OR 97439-8216

State Service

ALIK LEE
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAVID NG
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5207
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EVELYN P. GONZALES
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5207
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JEANNINE ELZEY
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOHANNA M. SEVIER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KELLY HYMES
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5306
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KIM MALCOLM
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5005
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARIANA C. CAMPBELL
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MELICIA CHARLES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL BLACK
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RISA HERNANDEZ
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT KINOSIAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5202
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT LEHMAN
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARITA SARVATE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARVJIT S. RANDHAWA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TERRIE J. TANNEHILL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THOMAS M. RENAGHAN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ZAIDA AMAYA-PINEDA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814